



## **PITTSBURG POWER COMPANY**

65 Civic Drive  
Pittsburg, California 94565-3814  
July 30, 2004

Debbie R. Dietz  
Rates Manager  
Sierra Nevada Customer Service Region  
Western Area Power Administration  
114 Parkshore Drive  
Folsom, CA 95630-4710

Dear Ms. Dietz,

Thank you for this opportunity to comment on the 2005 Proposed Rate Adjustment. We commend Western and its staff for developing an excellent rate proposal and appreciate the comprehensive approach taken. However, we do have one area of significant concern where we believe certain customers are not treated equitably under Western's proposal.

As a customer of Western that takes delivery off of the PG&E transmission system (non-direct connect), we would be subject to stacking of transmission charges: paying both Western's fully embedded transmission rate and the California Independent System Operator's (ISO) fully embedded rate for all Federal Power deliveries. This, in effect, would result in paying twice for transmission service. We believe this is not only inequitable, but is not in keeping with earlier proposals by Western, and indeed may not meet the intent of Congress in authorizing the CVP.

As a remedy, we recommend that Western modify its proposal to mitigate this situation. This could be accomplished by either rolling-in the ISO transmission charges to develop the total CVP transmission revenue requirements applicable to all users of Western's transmission system, including customers that are directly connected to the Western transmission system which would result in all Western customers paying the same transmission rate. Another remedy might be to exclude Western's transmission revenue requirement within the Base Resource revenue requirement for non-direct connected customers which would result in non-direct connect customers having to pay only the ISO transmission charge and not being subjected to inequitable rate stacking for Federal Power deliveries.

Thanks again for the opportunity to comment on Western's rate proposal.

Sincerely,

Claude Coss  
Administrative Analyst III  
Pittsburg Power Company/Island Energy

cc: Hiroshi F. Kashiwagi